

**Michigan Department of Community Health  
Division of Environmental Health  
Healthy Homes Section**

**Instructions for Completing an EBL Environmental Investigation Report**

**BEFORE YOU BEGIN:**

- Ensure that you have downloaded the most recent version of the EBL EI Report template. This lowers your risk of being out of compliance with Michigan's lead regulations and increases the quality of your final product. Use all of the sections and appendices in the report template.
- The EBL EI Report Template and other guidance documents that are referenced below may be found at the [mi.gov/leadsafe](http://mi.gov/leadsafe) website under "State-Certified Lead Professionals" > "EBL Environmental Investigators".

**OTHER REMINDERS:**

- The EBL report should be mailed first-class to the parent/guardian. The rental property owner's copy should be mailed certified with return receipt or by proof of service; remove Appendix H before mailing to the rental property owner.
- The report must be mailed within 30 days of receiving the laboratory results. Both the parent/guardian and property owner are to receive the EBL EI report.
- If renovation work was done on the property by a contractor within the past year, consider providing an anonymous tip to our lead enforcement officer so that a compliance investigation can be done for Michigan's Pre-Renovation Education law. The following information, that is collected during your household interview, should be sent to Jim Copeland at [CopelandJ3@mi.gov](mailto:CopelandJ3@mi.gov): 1) describe renovation activities; 2) where the work was done; 3) when work was done; 4) whether the household was given an information booklet; 5) contractor name/license/phone/address.
- When giving a copy of the report to anyone other than medical providers/health department staff, remove Appendix H from the EI report. All child information and protected health information, including names, dates of birth, blood lead data, sibling data, child-specific behaviors, and any other information that could be used to identify your client should be redacted (blacked or whited out) from your EI report. This type of information is in Appendix H. Ensure that any child-specific information that you wrote in your narrative is also removed before providing to the property owner.
- **Find out if any prior lead testing has been done.** Ask the property owner and check the Michigan Lead Registry at [michigan.gov/ismyhomeleadsafe](http://michigan.gov/ismyhomeleadsafe). If testing has been done within the past year, review the report if available.

## **EBL Environmental Investigation Report Instructions:**

The template has been designed to prompt the investigator for site-specific information to complete the report. Overwrite or delete all red text within the template to complete your report. Black text should remain. The following guidance supplements the red instructions within the template:

### **Section 2.1 – Existing Lead Paint Hazards and Corrective Action Options**

### **Section 2.2 – Potential Lead Hazards and Corrective Action Options**

- An easy way to populate Table 2.1 and Table 2.2 in these sections is to use the following steps:
  1. List all components with positive XRF readings in deteriorated condition in Table 2.1 (hazard).
  2. List all components with positive XRF readings in intact condition in Table 2.2 (potential hazard).
  3. Where a positive dust wipe is located near a positive (XRF) horizontal component (friction or impact only) in intact condition, the component should be listed in Table 2.1 (hazard). Examples of friction/impact components are window sashes, parting beads, window/door jambs, window troughs and door stops.
  4. If dust wipes are positive, list component tested as a hazard in Table 2.1 (hazard).
  5. List all positive soil samples in Table 2.1 (hazard).
- The website has a downloadable table available with a comprehensive list of housing components and standard hazard reduction recommendations. You can adopt these recommendations verbatim for your report, and you can edit them to be more specific to the hazards found at your subject property.<sup>1</sup>
- *Severity* rates only the condition of the paint, soil, or dust hazard.
- *Priority* is a numerical rating to indicate what needs to be done first. Accessibility and location are factored in. Sometimes a hazard that is very severe is not a priority due to its location or child inaccessibility. Conversely, a somewhat less severe hazard could be a very high priority due to its location and child accessibility. *Severity* and *priority* are determined relative to the property, based on your professional judgment.
- Per current HUD guidance, bathtubs and sinks should be listed under “personal property” and not in Table 2.1 (hazards). These items may still be listed as potential hazards in Table 2.2.

### **Section 2.3 – Dust Lead Hazards<sup>2</sup>**

- Copies of the laboratory results do not need to be included.

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<sup>1</sup> Refer to: Table of Lead Paint Hazard Corrective Action Options, available on website.

<sup>2</sup> Refer to: MDCH Lead Laboratory’s Dust Wipe and Soil Sampling Procedures, available on website.

- If dust wipes cannot be obtained (inaccessibility, occupant refusal, etc.), document the reasons in Section 3.0 – Project Limitations, Difficulties and Excluded Components.
- Add or eliminate rows, as needed.
- Be sure that room numbers and names match the floor plan included in the report.
- Do not list personal property. List these items in 2.6 – Personal Property Testing Results.

## **Section 2.4 – Soil Lead Hazards<sup>2</sup>**

If soil samples were not collected due to snow cover, soil samples should be collected as soon as weather permits. An updated EBL EI report that incorporates the soil data should be sent to the parent/guardian and rental property owner, if any. A cover letter explaining the soil addition should be noted to avoid any confusion.

## **Section 2.5 – Positive XRF Readings**

- Record the serial number of your XRF.

## **Section 2.6 – Personal Property Testing Results**

Positive and negative XRF results for personal property should reflect a 0.1 mg/cm<sup>2</sup> threshold rather than 1.0 mg/cm<sup>2</sup>. You may need to change the positive/negative status manually in the table. Bathtubs and sinks should be included here.

## **Section 4.1 – Building Condition**

Date of construction is required by law. Check with the local property and tax assessor for the date on record. Some items are to be answered from the investigator's own visual observation; others should be asked during the household interview.

## **Section 4.2 – Paint Condition**

Complete the table based on your observations after assessing the whole house. With the exception of the "Probable Cause" column, the others can be documented with check-marks or Y/N-style reporting.

## **Section 5.0 – Household Interview**

These questions should be asked of the subject child's primary caregiver at the home. The caregiver can read along; however, do not allow them to fill out the questionnaire on their own, as reading comprehension can affect accuracy of responses. The survey has been moved to Appendix H, which is the last document in the report. This was designed to easily remove it for the rental property owner's copy of the report. Obtain the signature of your interviewee at the end of the survey.

## **Section 6.0 – Floor Plans**

Remove red text before finalizing.

## **Section 6.1 – Site Plan**

If Table 2.1, Existing Lead Paint Hazards and Corrective Action Options, includes soil, designate sampling locations on the site plan. Remove red text before finalizing.

## **Section 6.2 – Site Map**

Insert a neighborhood street map with a pin designating the subject property location.

## **Section 9.0 – Investigator Certification**

The EBL Investigator must sign. This certifies that the Investigator is responsible for the report content.

## **Appendix B – Photographs**

Remove red text before finalizing.

## **Appendix D and E – Positive XRF Readings and All XRF Readings**

- Include building component testing only and permanent features (i.e. registers, etc.).
- Include XRF calibration readings in the tables. Three calibration readings must be taken when the XRF is turned on, every 4 hours during operation, and before it is turned off.
- Any XRF tables that are not bracketed by calibration readings are considered incomplete.
- Paint condition should only be characterized as intact or deteriorated.<sup>3</sup>
- Reported results should be positive or negative. “Null” readings indicate that the XRF was removed from the tested component before the test was complete. “Inconclusive” results indicate that the lead level on the painted surface is in a range that the XRF is unable to quantify. “Null” readings may be removed if the component later tested with a conclusive positive or negative reading. “Inconclusive” readings must be left in the report. Any component without a conclusive reading should be presumed positive.
- Remove red text before finalizing.

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<sup>3</sup> Refer to: Lead-Based Paint Condition Identification tutorial, available on website.